

FILED

FEB 21 2024

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MATTHEW CAHILL,
JOSHUA HOPKINS,
HARVEY HALE, and
DONALD ANDERSON,

Defendants.

4:24CR073 SEP/NCC

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Commit Bank Fraud: 18 U.S.C. § 1349

1. Beginning from in or about at least February 2020, and continuing until at least September 2021, within the Eastern District of Missouri, and elsewhere,

**MATTHEW CAHILL,
JOSHUA HOPKINS,
HARVEY HALE, and
DONALD ANDERSON,**

defendants herein, and others both known and unknown, did knowingly and willfully conspire and agree among themselves and each other to devise and execute a scheme and artifice to obtain money and funds owned by, and in the custody and control of multiple banks, the deposits of which were insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344(2).

MANNER AND MEANS

The manner and means of the conspiracy was as follows:

2. It was part of the conspiracy that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, began obtaining personal checks, bank account information, and personally identifying information (PII) of multiple victims by removing their outgoing or delivered U.S. Mail from their mailboxes.

3. It was further part of the conspiracy that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, began obtaining personal checks, bank account information, and PII of multiple victims by removing said information from the residences and vehicles of the victims, or obtaining that information by other means.

4. It was further part of the conspiracy that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, then altered the legitimate stolen checks, by either marking the checks or washing the checks, to be made payable to themselves or to others associated with them

5. It was further part of the conspiracy that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, used the account information from the personal checks or other bank account information to create false and fraudulent counterfeit checks, made payable to themselves or others associated with them.

6. It was further part of the conspiracy that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, and others known and unknown to the Grand Jury, executed or attempted to execute the scheme to defraud by passing or attempting

to pass these altered or counterfeit checks, drawn on federally insured bank accounts, at multiple retailers as payment for merchandise.

7. It was further part of the conspiracy that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, and others known and unknown to the Grand Jury, executed or attempted to execute the scheme to defraud by cashing or attempting to cash these altered or counterfeit checks, drawn on federally insured bank accounts, at multiple financial institutions, before the federally insured banks determined the checks were altered or counterfeit and could not be negotiated.

All in violation of Title 18, United States Code, Sections 1349 and 2.

COUNTS 2-15
Bank Fraud: 18 U.S.C. §1344

A. Introduction

8. The allegations contained in paragraphs 1-7 are hereby realleged and incorporated by reference herein.

9. At all times relevant to the Indictment, Citizens Bank, US Bank, Bank of Washington, Bank of Franklin County, The Missouri Bank, United Bank of Union, Farmers & Merchant Bank, Heritage Community Bank, and PNC Bank were all financial institutions within the meaning of 18 U.S.C. § 20.

10. At all times relevant to the Indictment, defendants **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE**, and **DONALD ANDERSON**, resided in the Eastern District of Missouri.

B. The Scheme to Defraud

11. Beginning in or about February 2020, and continuing through at least September 2021, in the Eastern District of Missouri and elsewhere, defendants **MATTHEW CAHILL, JOSHUA**

HOPKINS, HARVEY HALE, and DONALD ANDERSON, aided and abetted by individuals known and unknown to the Grand Jury, devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

C. Manner and Means

The Scheme and Artifice to defraud was in substance as follows:

12. Beginning in or about October 2020, Defendants **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE, and DONALD ANDERSON**, and others known and unknown to the Grand Jury, began obtaining personal checks, bank account information, and PII of multiple victims by removing their outgoing or delivered U.S. Mail from their mailboxes.

13. It was further part of the scheme and artifice to defraud that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE, and DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, obtained personal checks, bank account information, and PII of multiple victims by removing said information from the residences and vehicles of the victims, or obtaining that information by other means.

14. It was further part of the scheme and artifice to defraud that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE, and DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, then altered the legitimate stolen checks, by either marking the checks or washing the checks, to be made payable to themselves or to others associated with them

15. It was further part of the scheme and artifice to defraud that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE, and DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, used the account information from the

personal checks or other bank account information to create false and fraudulent counterfeit checks, made payable to themselves or others associated with them.

16. It was further part of the scheme and artifice to defraud that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE, and DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, executed or attempted to execute the scheme to defraud by passing or attempting to pass these altered or counterfeit checks, drawn on federally insured bank accounts, at multiple retailers as payment for merchandise, which were accepted by the retailers before the federally insured banks alerted the retailers that the checks were altered or counterfeit and could not be negotiated.

17. It was further part of the scheme and artifice to defraud that **MATTHEW CAHILL, JOSHUA HOPKINS, HARVEY HALE, and DONALD ANDERSON**, aided and abetted by others known and unknown to the Grand Jury, executed or attempted to execute the scheme to defraud by cashing or attempting to cash these altered or counterfeit checks, drawn on federally insured bank accounts, at multiple financial institutions, before the federally insured banks determined the checks were altered or counterfeit and could not be negotiated.

18. It was further part of the scheme and artifice to defraud that **MATTHEW CAHILL**, aided and abetted by others known and unknown to the Grand Jury, used the name and PII of at least one individual to open a bank account in the other individual's name, and to use that account to cash stolen, altered, or counterfeit checks.

COUNTS 2-4

19. The allegations contained in paragraphs 1-18 are hereby realleged and incorporated by reference herein.

20. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

MATTHEW CAHILL,

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute or attempt to execute a scheme and artifice to obtain the money, funds, and other property owned by or under the control of the financial institutions listed below, by means of material false or fraudulent pretenses, representations and promises, in that **MATTHEW CAHILL**, presented and used stolen, altered, or counterfeit checks as payment at multiple retail stores, drawn on the financial institutions listed below, knowing that the checks were not legitimate, and he had no authorized or legal purpose for accepting or converting funds drawn on the accounts of the victims:

COUNT	DATE	CHECK NO.	VICTIM ACCT HOLDER	FINANCIAL INSTITUTION
2	8/16/2021	5574	W.B.	Citizens Bank
3	8/21/2021	2989	R.J.	US Bank
4	4/2/2021	1026	J.R.	US Bank

All in violation of Title 18, United States Code, Section 1344 and 2.

COUNT 5

21. The allegations contained in paragraphs 1-20 are hereby realleged and incorporated by reference herein.

22. On or about July 30, 2021, in the Eastern District of Missouri, the defendant,

MATTHEW CAHILL,

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute or attempt to execute a scheme and artifice to obtain the money, funds, and other property owned by or under the control of Citizens Bank, by means of material false or fraudulent pretenses, representations and promises, in that **MATTHEW CAHILL** did electronically send money from the Citizens Bank checking account belonging to W.B. by way of an online ACH payment to an

individual associated with Defendant Cahill, and he had no authorized or legal purpose for withdrawing or converting the funds drawn on the accounts of the victim.

In violation of Title 18, United States Code, Section 1344 and 2.

COUNTS 6-9

23. The allegations contained in paragraphs 1-22 are hereby realleged and incorporated by reference herein.

24. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

JOSHUA HOPKINS,

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute or attempt to execute a scheme and artifice to obtain the money, funds, and other property owned by or under the control of the financial institutions listed below, by means of material false or fraudulent pretenses, representations and promises, in that **JOSHUA HOPKINS** cashed or attempted to cash stolen, altered, or counterfeit checks at the financial institutions listed below, knowing that the checks were not legitimate, and he had no authorized or legal purpose for accepting or converting funds drawn on the accounts of the victims:

COUNT	DATE	CHECK NO.	VICTIM ACCT HOLDER	FINANCIAL INSTITUTION
6	8/15/2021	1284	K.B.	Bank of Washington
7	8/19/2021	2153	J.W.	Bank of Franklin County
8	8/23/2021	2154	J.W.	Bank of Franklin County
9	8/25/2021	1083	H.B.	Bank of Franklin County

All in violation of Title 18, United States Code, Section 1344 and 2.

COUNTS 10-12

25. The allegations contained in paragraphs 1-24 are hereby realleged and incorporated by reference herein.

26. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

HARVEY HALE,

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute or attempt to execute a scheme and artifice to obtain the money, funds, and other property owned by or under the control of the financial institutions listed below, by means of material false or fraudulent pretenses, representations and promises, in that **HARVEY HALE** presented and used stolen, altered, or counterfeit checks as payment at multiple retail stores, drawn on the financial institutions listed below, or cashed or attempted to cash stolen, altered, or counterfeit checks at the financial institutions listed below, knowing that the checks were not legitimate, and he had no authorized or legal purpose for accepting or converting funds drawn on the accounts of the victims:

COUNT	DATE	CHECK NO.	VICTIM ACCT HOLDER	FINANCIAL INSTITUTION
10	9/4/2021	3525	H&S	Heritage Community Bank
11	8/30/2021	91248	E.M.C.C.	United Bank of Union
12	9/29/2021	3016	C.N.	Farmers & Merchants Bank

All in violation of Title 18, United States Code, Section 1344 and 2.

COUNTS 13-15

27. The allegations contained in paragraphs 1-26 are hereby realleged and incorporated by reference herein.

28. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

DONALD ANDERSON,

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute or attempt to execute a scheme and artifice to obtain the money, funds, and other property owned by or under the control of PNC Bank, by means of material false or fraudulent pretenses, representations and promises, in that **DONALD ANDERSON** cashed and deposited stolen, altered, or counterfeit checks at PNC Bank, knowing that the checks were not legitimate, and he had no authorized or legal purpose for accepting or converting funds drawn on the accounts of the victims:

COUNT	DATE	CHECK NO.	VICTIM ACCT HOLDER	FINANCIAL INSTITUTION
13	6/9/2021	3262	B.P., LLC	PNC Bank
14	6/10/2021	0786	G.P.F., LLC	PNC Bank
15	6/10/2021	2005	D.C.P.M.	PNC Bank

All in violation of Title 18, United States Code, Section 1344 and 2.

COUNT 16-25
Aggravated Identity Theft – 18 U.S.C. § 1028A

COUNT 16

29. The allegations contained in paragraphs 1-28 are hereby realleged and incorporated by reference herein.

30. On or about November 19, 2020, in the Eastern District of Missouri, the defendant,

MATTHEW CAHILL,

did knowingly possess, transfer, and use, without lawful authority, the name, date of birth, and Social Security Number of victim C.B., knowing that those means of identification belonged to another actual person, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNTS 17-19

31. The allegations contained in paragraphs 1-30 are hereby realleged and incorporated by reference herein.

32. On or about the dates listed below, in the Eastern District of Missouri, the defendant,
MATTHEW CAHILL,
did knowingly possess, transfer, and use, without lawful authority, the name, checking account number, and purported signature of the victims listed below, knowing that those means of identification belonged to another actual person, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344:

COUNT	DATE	VICTIM
17	8/16/2021	W.B.
18	8/21/2021	R.J.
19	4/2/2021	J.R.

All in violation of Title 18, United States Code, Section 1028A.

COUNTS 20-22

33. The allegations contained in paragraphs 1-32 are hereby realleged and incorporated by reference herein.

34. On or about the dates listed below, in the Eastern District of Missouri, the defendant,
JOSHUA HOPKINS,
did knowingly possess, transfer, and use, without lawful authority, the name, checking account number, and purported signature of the victims listed below, knowing that those means of identification belonged to another actual person, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344:

COUNT	DATE	VICTIM
20	8/15/2021	K.B.
21	8/19/2021	J.W.
22	8/25/2021	H.B.

All in violation of Title 18, United States Code, Section 1028A.

COUNT 23

35. The allegations contained in paragraphs 1-34 are hereby realleged and incorporated by reference herein.

36. On or about September 29, 2021, in the Eastern District of Missouri, the defendant,

HARVEY HALE,

did knowingly possess, transfer, and use, without lawful authority, the name, checking account number, and purported signature of C.N., knowing that those means of identification belonged to another actual person, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNT 24

37. The allegations contained in paragraphs 1-36 are hereby realleged and incorporated by reference herein.

38. On or about June 9, 2021, in the Eastern District of Missouri, the defendant,

DONALD ANDERSON,

did knowingly possess, transfer, and use, without lawful authority, the name and purported signature of the victim J.B., knowing that those means of identification belonged to another actual person, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNT 25
Possession of Stolen Mail – 18 U.S.C. §1708

39. The allegations contained in paragraphs 1-38 are hereby realleged and incorporated by reference herein.

40. On or about August 21, 2021, in the Eastern District of Missouri, the defendant,

MATTHEW CAHILL,

did unlawfully have in his possession a letter, postal card, package, bag, mail, or an article contained therein, which had been stolen, taken, embezzled, and abstracted from a letter box, mail receptacle, mail route, or carrier, which was an authorized depository for mail matter, knowing the said letter to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Section 1708.

A TRUE BILL

FOREPERSON

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